

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-2(c) WILLIAM H. OLIVER, JR. 2240 Highway 33 Suite 112 Neptune, New Jersey 07753 732-988-1500 Attorney for Debtor(s) WO-7129	
In Re: MARTIN MICKEY GOLDIN, <div style="text-align: right;">Debtors</div>	Case No.: 14-19401 Adv. No: Hearing Date: 7/24/18 @ 9:00 AM Chapter: 13 Oral Argument Requested if Objection Filed Judge: Michael B. Kaplan

NOTICE OF MOTION TO RE-OPEN CASE

TO:

Albert Russo, Chapter 13 Trustee
CN 4853
Trenton, NJ 08650-4853

Mr. Martin M. Goldin
4 Crescent Road
Holmdel, NJ 07733

All Creditors (See attached Certificate of Service)

PLEASE TAKE NOTICE that the undersigned will apply to the United States Bankruptcy Court located in Trenton, New Jersey on Tuesday, July 24, 2018 at 9:00 AM or as soon thereafter as counsel can be heard for an Order reopening Debtor's Chapter 13 case which was Closed without Discharge due to previous Discharge on January 10, 2018 for the purpose of filing an Application to Cancel and Discharge a Mortgage.

STATEMENT REGARDING BRIEF

PLEASE TAKE FURTHER NOTICE that pursuant to D.N.J. LBR 9013-2, the undersigned maintains that no brief is necessary because the issues involved are not complex or novel, Movant relies on clear statutory language as the basis for relief, and the moving papers give adequate notice of movant's theory of relief and relevant facts.

PLEASE TAKE FURTHER NOTICE that pursuant to D.N.J. LBR 9013-1(f), the movant shall only appear for oral argument if this Motion becomes contested, or if the court otherwise directs.

LOCAL RULE 9013-1(a) AND (d)

PLEASE TAKE FURTHER NOTICE that pursuant to D.N.J. LBR 9013-1(a) and (d), unless timely responsive papers are filed in accordance with the appropriate rules, this Motion shall be deemed uncontested.

Dated: June 12, 2018

/s/ William H. Oliver, Jr.

WILLIAM H. OLIVER, JR.

ATTORNEY FOR DEBTOR